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ABSTRACT

Under the 1996 federal welfare law, Temporary Assistance for Needy Families (TANF), an unmarried minor parent with a child generally cannot receive federal welfare assistance unless she is living with her family or in some type of adult-supervised arrangement. Exemptions are available and states have flexibility in designing their policies and practices. This publication illustrates how various localities are implementing provisions of the law, highlights implementation issues of note, and identifies strategies used in various communities to provide adult-supervised living to minor parents in need of these supports. Nine urban communities provided information about their policies. Responses describe various case management models for minor parents living independently and illustrate issues related to coordination with the child welfare system. Two major issues affect local implementation of TANF rules related to minor parents. Most states and communities do not have adequate statistics to provide a better picture of the impact of the rule. In addition, there are varied perspectives about how big the issue really is. Some suggestions are made to strengthen the provision of TANF services. (SLD)

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CENTER FOR ASSESSMENT AND POLICY DEVELOPMENT

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SEEKING SUPERVISION

Local Implementation of the TANF Minor Teen Parent Living Arrangement Rules

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II. EXECUTIVE SUMMARY

Under the 1996 federal welfare law (Temporary Assistance for Needy Families - TANF), an unmarried, minor parent with a child generally cannot receive federal welfare assistance unless she is living with her family or in some type of adult-supervised arrangement; exemptions are available and states have enormous flexibility in designing their policies and practices.

To better understand the minor parent living arrangement policy choices made by states, the implications of those choices from the local perspective, and some solutions to the thorny issue of inadequate housing for minor mothers, this publication is issued as part of a series that addresses this range of topics. The series was developed with funding from The Annie E. Casey Foundation to the Center for the Assessment of Policy Development (CAPD), who collaborated with the Center for Law and Social Policy (CLASP) and the Social Policy Action Network (SPAN). Each organization has historically worked on projects related to minor parents.

The resulting series of reports include:

Seeking Supervision: State Policy Choices in Implementing the TANF Minor Teen Parent Living Arrangement Rule [CLASP]

Seeking Supervision: Local Implementation of the TANF Minor Teen Parent Living Arrangement Rule [CAPD]

Seeking Supervision: Second Chance Homes and the TANF Minor Teen Parent Living Arrangement Rule [SPAN]

This publication, ***Seeking Supervision: Local Implementation of the TANF Minor Teen Parent Living Arrangement Rule,*** illustrates how various localities are implementing these provisions of the law, highlights implementation issues of note and identifies strategies used in various communities to provide adult-supervised living to minor parents in need of these supports.

Localities participating in this project include: in California, Los Angeles and San Diego; in Colorado, Denver; the District of Columbia; in Michigan, Wayne (Detroit) and Genessee (Flint) Counties; in Minnesota, Hennepin County (Minneapolis); and in New Jersey, Burlington (Trenton) and Camden Counties. Within each community, CAPD spoke with several informants that could provide differing perspectives on implementation of the minor parent living arrangement rule. This generally included local welfare officials, child welfare officials (if appropriate) and providers of housing and residential services for minor parents and their children as well as providers that support teens in other ways beyond housing. In one state, we were able to conduct interviews with minor parents themselves.

With each informant, CAPD explored a myriad of issues relative to the implementation of this rule. Their opinions give some indication of the potential implications of policy choices made by states.

This report summarizes major issues regarding:

- strategies used by various communities to implement intake, eligibility and determination functions associated with this rule as well as major implementation issues of note;
- various community approaches to providing adult-supervised living for minor parents who cannot live at home with a parent, guardian or with an adult relative including group homes and apartment models;
- case management models for minor parents living independently; and
- issues related to coordination with the child welfare system.

The report also provides thoughts — based on discussions with community informants — on the types of supports and assistance that communities may need to adequately implement this rule and to ensure that adult-supervised housing is not a barrier to the receipt of public assistance.

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Local Implementation of the Rule and Associated Issues

Prior to illustrating community experiences, it is important to highlight two major issues that affect local implementation of this rule:

- most states and communities do not maintain statistics that would provide a better picture of the impact of this rule. For instance, there is a lack of accessible information on the number of minor parents applying for assistance before and after implementation; denied assistance due to this requirement; and who cannot live at home and must find alternative housing. As such, it is somewhat difficult to understand the nature of the problem and the full impact of the law.

- there are various perspectives on how big of an issue this is. It is not unlikely to get different messages from state and local welfare officials in any given state or from local welfare officials and program providers in any given community. For example, some believe that this issue is "not a problem" because teens can find someone to live with that meets the requirements of the law. *However, CAPD suggests, and many would agree that the housing they may find may be short-term attributing to the transiency of this population and such housing may not be well-suited for raising children. In addition, many suggest that this is not a big issue because the welfare minor parent population is so small. However, almost half of all poor children in this country under the age of six are born to an adolescent parent. The U.S. Department of Health and Human Services' 1998 TANF Report to Congress makes the point that while minor parents do not make up a large percentage of the welfare caseload, they have longer periods of welfare dependency and can be the most difficult to serve.*

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In light of these issues, there is another reason why states, communities and advocates must pay close attention to the implementation of this rule — *the high incidence of sexual abuse among minor mothers.* Research indicates that over 60% of the teen parent population has experienced sexual and/or physical abuse, often by a household member. Policies relative to required living arrangements must take this into account.

Getting young families on public assistance under the new welfare law generally includes a number of steps including intake and eligibility determination, exploring if there is a "good cause" for minor parents not to live with a parent, guardian or adult relative, and referring minor parents to adult-supervised living of some kind. There are, however, differences in the ways in which these functions are carried out across communities and major issues which warrant the attention of program and policy officials regarding implementation. Major issues of note include:

- the lack of information on minor mothers and the impact of this rule.

Communities often do not have accurate data on the number of minor mothers on TANF as well as the number of minor mothers who are in need of adult-supervised living. In addition, states/communities are not documenting what happens to teens who apply for assistance and are denied due to this rule.

- the lack of understanding and awareness about the provision and its exemptions.

For example, there is concern that minor mothers are not fully aware that there are exemptions to living with a parent, guardian or relative and that there may be residential programs in the community for which they are eligible. In addition, the non-profit provider system is not fully informed on this rule and associated processes. As a result, they cannot adequately inform young mothers on these issues.

- inconsistency in implementation resulting from a lack of supports for, and the discretion of, individual staff.

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TANF staff are taking on new responsibilities. State and local policy provides some guidance, however, staff have some discretion on many aspects of implementation. For example, while the federal law allows for minor mothers to live with a parent, guardian or adult relative, some welfare staff may "emphasize" living in one arrangement over the other. Another area where there is discretion is determining when a referral to child welfare is necessary in the instances of what appears to be an "unsafe home".

- system interface issues, i.e., how different parts of the system work together.

In many communities, responsibilities for implementation are shared among multiple partners (several divisions within welfare, between welfare and child welfare, etc.). We found that partners can approach the implementation of the rule in different ways and have different philosophies about what they do. Another example is the lack of follow-up on referrals for minor mothers and their families at critical junctures of the process (i.e., referrals to counseling for reunited families; to case management or community supports for those denied assistance or who cannot comply, etc.)

Local Strategies to Provide Adult-Supervised Living

Adult-supervised, supportive living, as defined by the law, is one in which minor parents are required to learn parenting skills, budgeting and other skills to promote their long-term economic independence and the well-being of their children. This includes, the law states, "a second chance home, maternity home, or other appropriate adult-supervised supportive living arrangement." States have begun to identify adult-supervised arrangements deemed acceptable for minor mothers and their children. CAPD was able to explore the following models and identify pros and cons of each. For example:

- *group homes* offer the supervision necessary to support younger teen mothers; provide an environment conducive to peer exchange among the residents around such areas as child-rearing and healthy relationships and offer the structure necessary for young women, many of whom have been victims of abuse, to feel safe and secure.
- *supervised apartments* provide minimal supervision for those that are either older and/or are closer to a transition to independent living and it may be easier to get apartment models up and running.
- *mentor homes* or private residences can be thought of as similar to foster care except the providers are not certified foster parents and do not serve minor parents in the child welfare system. These models offer a family atmosphere; provide modeling of appropriate parenting and child-rearing behaviors for the young mother and provide some flexibility for the teen to remain in a specific geographic area.

Major challenges facing communities in their efforts to provide adult-supervised living to homeless minor mothers include the following:

- major funding barriers.

This includes a lack of knowledge of funds that are available. In addition, the categorical nature of funding is a barrier — there is a lack of flexible dollars, like TANF and HUD homeless funds, that enable a community to support all young mothers in need. Another issue related to funding is the nature of block grants; while TANF is a flexible funding source that may be used to build second chance homes and other residential models, these funds are not targeted to supporting minor mothers. States can choose not to invest funds in this manner.

- regulatory barriers.

These include licensing requirements for program providers who provide residential services particularly to the youngest minor mothers. States set age limits for when a child placement agency license is necessary — it can be costly for programs to meet licensing standards.

- the lack of housing options for teens with different needs and experiences.

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Only a few communities that we are aware of have models that provide varied levels of structure and supervision. Again, this is clearly linked to funding and resource issues in addition to the lack of knowledge on behalf of the community as to the varied housing needs of this population. In addition, all of the communities are struggling with the lack of options minor parents have after they reach age 18.

Welfare and Child Welfare Interface Issues

The TANF adult-supervised living requirement encourages a new type of partnership between the welfare and child welfare systems in many communities across the country. The TANF provision requires welfare officials to make determinations about the appropriateness and safety of home environments — a task traditionally falling to child welfare officials. For this reason, state and community officials of these two systems are beginning to work together to share resources and expertise. As we point out below, however, there are issues associated with these partnerships:

- federal, state and local policy suggests that appearance of an "unsafe" home of a parent, legal guardian or adult relative is good cause for not requiring a minor mother to live in these arrangements. It is not clear, however, that a referral to the child welfare system is necessary if it is determined during eligibility determinations that the parental home appears unsafe;
- often the decision to refer to the child welfare agency is influenced by the extent to which the foster care system can place minor mothers and their children together. If there are no such placements available welfare staff may be more likely to recommend that teen parents live on their own, potentially with intensive case management; and
- when child welfare staff carry out assessment activities for welfare staff, this is considered an open child protective case. Some welfare staff feel this is problematic.

Recommendations and Next Steps

The above-mentioned issues raise a number of implications — states and communities are challenged by the new welfare policy and we see a need for providing assistance in a number of areas. While this report identifies a host of concerns regarding the adult-supervised living rule, there are some basic areas of understanding and agreement. For example, there is little argument that *the TANF minor parent provisions aim to facilitate the self-sufficiency of young families and that minor mothers should be in supervised settings. However, obtaining this goal can only occur when there are strategies in place to provide minors with the resources they need to comply with these requirements; this includes access to safe, supportive housing and a range of educational options to comply with the school provisions. In addition, the TANF minor mother policies require new supports to the systems responsible for implementing them.*

With these issues in mind, the following activities are critical (in addition to specific recommendations for states and communities identified in the body of this report):

- the welfare system should clarify the intent of the rule and how it relates to improving outcomes for minor mothers and their children for all entities working with young families.

While most people do agree that minor mothers should live in supervised settings, there are mixed opinions as to whether this provision is to "punish" young mothers, prevent teen pregnancy, deter young mothers from getting their own assistance, etc. The law states, however, that adult supervision is for the purposes of *building parenting skills, budgeting and other self-sufficiency skills.* How we describe this rule (i.e., the live-at-home requirement) often does not portray the law's true intent and can influence implementation and practice.

- support to organize and strengthen the minor parent provider community to address the needs of young families.

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III. Executive Summary (continued)

To ensure that minor parents in need of public assistance and safe supportive housing receive these services, many agencies must work together including welfare, child welfare, schools, health care, housing and community-based service providers. This does not just require resources — states actually can use available TANF surplus funds to support such collaboration. In addition, states and communities also need information about how these issues are addressed across the country. Communities would benefit tremendously from technical assistance and facilitation around these issues as well as planning funds to develop comprehensive visions and action strategies.

- support the development of data and management information systems that provide information necessary to implement effectively.

Communities don't know the extent of need for alternative housing among minor mothers. While minor parents may be able to find housing to meet the requirements of the law, communities still report this is a transient population. As such, communities need tools and strategies to understand the true need and size of this issue. In addition, welfare systems need to build the capacity to document implementation experiences relative to this rule as well as the scope and size of the TANF minor parent population (in nested cases or with their own case).

- support to state and local welfare systems in their new roles.

Welfare staff are taking on a new responsibility — child placement. There are a host of issues associated with this role and some concern among welfare staff as to their ability to carry out these activities. Many may benefit from periodic discussions and/or training on these issues. Specifically, supports may be provided to staff that are responsible for conducting home assessments. There are many reasons why welfare officials may consider investing in minor parent case managers.

- create funding models that coordinate flexible funds (like TANF and HUD homeless funds) with categorical resources to build a range of safe supportive housing which contributes to the desired outcomes for young families.

Funding is a major barrier — communities are interested in building residential models but are limited by resources. More analysis and exploration is necessary to determine the best ways to use existing funds, in lieu of additional resources for states in this area.

Without these or similar investments, the TANF federal requirements are punitive measures that prohibit young families from reaching their full potential.

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III. SEEKING SUPERVISION

Introduction and Background

Under the 1996 federal welfare law (Temporary Assistance for Needy Families - TANF), an unmarried, minor parent with a child generally cannot receive federal welfare assistance unless she is living with her family or in some type of adult-supervised arrangement; exemptions are available and states have enormous flexibility in designing their policies and practices.

To better understand the minor parent living arrangement policy choices made by states, the implications of those choices from the local perspective, and some solutions to the thorny issue of inadequate housing for minor mothers, this publication is issued as part of a series that addresses this range of topics. The series was developed with funding from The Annie E. Casey Foundation to the Center for the Assessment of Policy Development (CAPD), who collaborated with the Center for Law and Social Policy (CLASP) and the Social Policy Action Network (SPAN). Each organization has historically worked on projects related to minor parents.

To gather information on these issues, these three organizations conducted a number of activities including:

- a national survey of states to document existing policies and procedures for implementing the TANF residency requirement as well as a convening with state representatives to further discuss these issues;
- site visits in seven states to understand local implementation issues relative to this rule. Site visits included discussions with local welfare officials as well as minor parent service providers;
- a review of extant literature on various types of living arrangements for minor parents and their children to glean lessons learned regarding the benefits of various housing models for this population;
- a review of federal funding streams that support residential programs for minor parents; and
- a convening with second chance home providers to document strategies to build alternative housing options for teens in need.

The resulting series of reports include:

Seeking Supervision: State Policy Choices in Implementing the TANF Minor Teen Parent Living Arrangement Rule [CLASP]

Seeking Supervision: Local Implementation of the TANF Minor Teen Parent Living Arrangement Rule [CAPD]

Seeking Supervision: Second Chance Homes and the TANF Minor Teen Parent Living Arrangement Rule [SPAN]

This publication, ***Seeking Supervision: Local Implementation of the TANF Minor Teen Parent Living Arrangement Rule,*** illustrates how various localities are implementing these provisions of the law, highlights implementation issues of note and identifies strategies used in various communities to provide adult-supervised living to minor parents in need of these supports. The following sections of this report include:

- an introduction which includes:
  - a brief overview of the TANF requirements;
  - background on the communities visited, including how they were selected;
  - a brief summary of the data collection methodology in these communities; and
  - descriptions of strategies used by various communities to implement intake, eligibility and determination functions associated with this rule as well as a summary of major implementation issues of note;
- various community approaches to providing adult-supervised living for minor parents who cannot live at home with a parent, guardian or with an adult relative including group homes and apartment models;

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- case management models for minor parents living independently; and
- issues related to coordination with the child welfare system.

The report also provides thoughts — based on discussions with community informants — on the types of supports and assistance that communities may need to adequately implement this rule and to ensure that adult-supervised housing is not a barrier to the receipt of public assistance.

Minor Parent Living Arrangement Requirements of the Temporary Assistance for Needy Families (TANF)

In 1996 Congress overhauled the nation's welfare system and established Temporary Assistance for Needy Families (TANF).[1] Under this law, unmarried, custodial minor parents who are younger than 18 are ineligible for federal TANF assistance unless they meet two requirements.[2] One requirement relates to participation in schooling/training and the other addresses the minor's living arrangement.

With respect to the living arrangement requirement, the 1996 federal law generally prohibits an unmarried, minor custodial parent from receiving federally-funded TANF benefits, unless she is living with a parent, legal guardian, or adult relative.[3] However, a minor can be exempted from this living arrangement rule if:

- the minor has no parent, guardian, or adult relative who is living or whose whereabouts are known;
- the minor has no parent, guardian, or adult relative who will allow her to live in their home;
- a state agency determines that the minor or her child is being or has been subjected to serious physical or emotional harm, sexual abuse, or exploitation in the parent, guardian, or adult relative's home;
- a state agency determines that living with a parent, guardian, or adult relative presents a risk of imminent or serious harm to the minor or her child; or
- a state agency determines that it is in the best interest of the minor's child to waive the rule.[4]

If a minor parent qualifies for one of these five exemptions, the state agency must provide, or assist her in locating, an alternative "adult-supervised supportive living arrangement," unless the state agency determines that her current living arrangement is appropriate. An adult-supervised living arrangement is defined as one in which minor parents are required to learn parenting skills, budgeting, and other skills to promote their long-term economic independence and the well-being of their children. The state may provide TANF assistance to an exempt minor, on the condition that she and her child continue to reside in an appropriate living arrangement.

The next section describes site visits made to various states and communities to gain better insight on the issues associated with implementing this rule.

[1] *For a review of the TANF law, see CLASP's* **Detailed Summary of Key Provisions of the Temporary Assistance of Needy Families Block Grant,** *Mark Greenberg and Steven Savner, 1996.*

[2] ***Before 1996, states had the option to mandate that minor mothers meet a living arrangement requirement but most did not. The states that implemented the option were mandated to adopt a set of exemptions listed in the law or ask the federal government for approval to make changes to the list of exemptions. The new federal law requires all states to establish a minor parent living arrangement requirement although, under the new law, states have the discretion not to provide TANF to minor parents (or other groups).***

[3] ***(42 U.S.C. §608(a)(5)(A))***

[4] ***(42 U.S.C. §608(a)(5)(B)(ii))***

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Communities Participating in SEEKING SUPERVISION Data Collection Efforts

Site visits were made to select communities to further understand and document local experiences in implementing this rule and providing various living arrangement options for minor parents. Several factors contributed to the identification of states/communities including:

- communities in states that have well-developed minor parent living arrangement policies. These include states that reportedly:[5]
  - have some ability to identify the number of teens that would be affected by this rule — that is, those teens who could not live at home with a parent or guardian or with an adult relative;
  - are attempting to use federal and/or state funds to build second chance homes and other living options for this population;
  - acknowledge the need to put a range of living options in place for this population;
  - provide some training for welfare staff responsible for minor parents;
  - have rules and policies that define appropriate placements for minor parents and their children;
  - have supportive child welfare policies i.e., attempts to place minor parents and their children together in foster care; and
  - involve the housing authority or other housing agency in some way to provide alternative living to minor parents in need.
- a community in at least one state that did meet such criteria described above;
- states/communities known to have implemented a unique and/or comprehensive strategy to implement this rule;
- states/localities that were not the subject of previous research on these issues;[6] and
- states/communities that CAPD has had some experience with to facilitate local contacts and data collection.

[5] *Information regarding state policies comes from early findings of the state survey conducted by CLASP. For final reporting on these issues, see the companion document* **Seeking Supervision: State Policy Choices in Implementing the TANF Minor Teen Parent Living Arrangement Rule, CLASP, 1999.**

[6] *Several existing documents provide information on the implementation of this rule in select states including:* **Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experiences in Four States, Mathematica Policy Research, Inc. 1997; Improving Outcomes for Mother and Child: A Review of the Massachusetts Teen Living Program, *Kathleen Reich, 1996.***

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III. Seeking Supervision: Introduction and Background (continued)

Several states met one or more of these criteria. We chose among them: California; Colorado; the District of Columbia; Michigan; Rhode Island; Minnesota and New Jersey. In some of these states, CAPD made visits to two communities. This was done in recognition of the fact that although state policy provides the parameters for how communities must implement this rule, local experiences may vary given various factors. These communities were identified based on a number of factors including those with large numbers of minor parents on welfare, those that were known to be implementing unique strategies and, again, localities CAPD has had some experience with to facilitate local contacts and data collection. Resulting localities participating in this project include:[7]

- in California, Los Angeles and San Diego;
- in Colorado, Denver;
- the District of Columbia;
- in Michigan, Wayne (Detroit) and Genessee (Flint) Counties;
- in Minnesota, Hennepin County (Minneapolis); and
- in New Jersey, Burlington (Trenton) and Camden Counties.

Within each community, CAPD spoke with several informants that could provide differing perspectives on implementation of the minor parent living arrangement rule. This generally included local welfare officials, child welfare officials (if appropriate) and providers of housing and residential services for minor parents and their children as well as providers that support teens in other ways beyond housing. In one state, we were able to conduct interviews with minor parents themselves.

With each informant, CAPD explored a myriad of issues relative to the implementation of this rule. Their opinions give some indication of the potential implications of policy choices made by states. The next section of this report summarizes ways in which local welfare offices carry out various functions as defined by their state's polices to provide TANF supports to minor parents and their children including intake, assessments of home environments and interactions between systems/agencies.

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[7]In Rhode Island, CAPD attended the Department of Human Services, monthly coordination meeting of all participants in the Adolescent Self-Sufficiency Collaboratives. CAPD also met with the Comprehensive Community Action Program, the lead agency in the development of the New Opportunity Homes.

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IV. LOCAL IMPLEMENTATION OF THE RULE AND ASSOCIATED ISSUES

States have great flexibility in developing policies to implement the minor parent living arrangement requirement. For example, states can make choices about: what is considered an acceptable adult-supervised living arrangement; exemption policies; and whether to fund alternative arrangements for teens that cannot live with a parent, guardian or adult relative.

Furthermore, many states have written policies which leave certain decisions to the discretion of local welfare officials. For example:

- in New Jersey, Camden County Social Service Offices have the ability to determine what is acceptable as an "adult-supervised setting." With a positive assessment by a social worker, the county can allow a non-relative adult to serve as a protective payee for a minor parent and satisfy the minor parent living arrangement requirement; and
- in Minnesota, Hennepin County welfare officials can make the determination, based on a social worker's assessment, that no satisfactory adult-supervised living arrangement exists. If that is the case, a teen may receive TANF benefits while living on her own.

To fully understand the implications of state policy, it is critical to explore implementation at the local level. While jurisdictions are somewhat limited by state policy in how they apply this rule, they have the responsibility to coordinate efforts across systems to "make it happen" and must design procedures tailored to their own needs and realities.

Prior to illustrating community experiences, it is important to highlight two major issues that affect local implementation of this rule:

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- most states and communities do not maintain statistics that would provide a better picture of the impact of this rule. For instance, there is a lack of accessible information on the number of minor parents:
  - applying for assistance before and after implementation;
  - denied assistance due to this requirement; and
  - who cannot live at home and must find alternative housing.

As such, it is somewhat difficult to understand the nature of the problem and the full impact of the law.

- there are various perspectives on how big of an issue this is. It is not unlikely to get different messages from state and local welfare officials in any given state or from local welfare officials and program providers in any given community. For example:
  - some believe that this issue is "not a problem" because teens can find someone to live with that meets the requirements of the law. *However, CAPD suggests, and many would agree that the housing they may find may be short-term attributing to the transiency of this population and such housing may not be well-suited for raising children; and*
  - many suggest that this is not a big issue because the welfare minor parent population is so small. *However, almost half of all poor children in this country under the age of six are born to an adolescent parent. The U.S. Department of Health and Human Services' 1998 TANF Report to Congress makes the point that while minor parents do not make up a large percentage of the welfare caseload, they have longer periods of welfare dependency and can be the most difficult to serve.*[8]

[8] **TANF Report to Congress, *1998. U.S. Department of Health and Human Services***

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IV. Local Implementation of the Rule and Associated Issues (continued)

In light of these issues, there is another reason why states, communities and advocates must pay close attention to the implementation of this rule — the high incidence of sexual abuse among minor mothers. Research indicates that over 60% of the teen parent population has experienced sexual and/or physical abuse, often by a household member.[9] Policies relative to required living arrangements must take into account.

With these issues in mind, the next section takes a closer look at linking minor parents with TANF.

Local Perspectives on TANF and the Live-at-Home Requirement

Getting young families on public assistance under the new welfare law generally includes the following broad activities:

- intake and eligibility determination which includes verification of residency to determine if the teen is in an agency-approved living arrangement;
- if a minor parent is not living with a parent, guardian or adult relative, exploring if there is a "good cause" reason for her not to (often referred to as good cause). This may include assessments of the parental home as well as of the current living arrangement; and
- if homeless, referring minor parents to adult-supervised living of some kind.

There are, however, differences in the ways in which these functions are carried out across communities. As mentioned above, strategies are often guided by state policy. However, even within a state, local welfare offices may take different approaches. Below is a summary of each of these functions including strategies. Each of the sections discusses implementation issues and what communities might consider.

Intake

Careful consideration of the ways in which young mothers enter the TANF system is critical; how this occurs has a substantial impact on the opportunities states have to implement the mandated minor mother provisions of the law which aim to improve outcomes for young families. Our discussions with informants in the field suggest that minor parents are made aware of the possibility of government assistance in a number of different ways. However, program providers suggested that while referrals are made by community organizations and schools, teens are most likely to know of government assistance through their own experiences with family members and friends. In addition, welfare officials and community-based providers indicated that teens are aware that current laws require them to live at home. *However, it is not clear that they know that there are exceptions to this rule.*

In the communities we visited, when minor parents arrive at the welfare office there are three ways in which they are handled:

- an initial screening is done by a generic eligibility worker. Based on the determination that further assessment or verification is necessary to determine eligibility, referrals are made to specialists, often social workers, teen parent case managers or child welfare workers who make follow up phone calls and carry out home studies;
- an eligibility worker determines if a minor parent is eligible for TANF funds; these eligibility workers support all applicants who come in the front door and minor parents are generally a very small portion of their caseload; and
- minor parents are immediately directed to minor parent case managers; these staff often only work with minor parents.

[9] *Debra Boyer and David Fine*, **Victimization and Other Risk Factors for Child Maltreatment Among School Age Parents: A Longitudinal Study.** ***ACF/HHS. Washington D.C. 1990.***

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IV. Local Implementation of the Rule and Associated Issues (continued)

Implementation Issues

Informants in communities we visited identified three major problems having to do with early TANF intake and eligibility functions. All have to do with the difficulty of getting accurate information to the minor parent. This can occur prior to a minor applying for assistance as well as during intake:

- there is the fear among the service provider community that teens are doing their own screening based on mis-information. Apparently, the word is out "on the street" that minor parents are not eligible for TANF benefits unless they are living with their parents — as stated above, they are not aware that there are exceptions to this rule. As a result, it is likely that minor parents in need of support are not applying. In a few localities, welfare officials indicated that the number of minor parents applying for TANF has reduced since the implementation of this rule. An official in one mid-western state specifically felt this was due to this requirement. However, others suggested that it might be associated with a decrease in births to teens. Unfortunately, all of this is based on anecdotal information; as mentioned above, most communities were not able to share statistics to this effect;
- there is also concern that minor parents may get incorrect information from eligibility workers themselves. Whether or not localities use teen specialists, there is the possibility that workers do not understand the regulations regarding residency requirements and possible exemptions for minor parents. Furthermore, some workers may not understand, or be able to share, the residential/housing resources available to minor parents; and
- in many of the communities we visited, non-profit teen parent providers are themselves unclear on the policies and procedures related to this requirement.

What States/Communities Might Consider

The issues identified above raise huge implications for outreach, intake and eligibility activities:

- communities should conduct outreach to inform young women and make them aware of the rules, exemptions and resources available to them. Potential outreach strategies may include using:
  - hospitals that conduct birth contacts for teen mothers [see Exhibit IV.I]
  - schools that provide minor parents services; and community-based providers.

While conducting outreach for minor mothers may seem counter to contemporary efforts to reduce welfare caseloads, *it is actually a prevention strategy which aims to reduce welfare dependency among minor mothers and their children in the long-term.*

- there are multiple partners that may participate in such activities — **what is critical is that these groups are clearly informed and aware of minor parent living arrangement policies and exemptions. For this reason, welfare officials must take efforts to familiarize the non-profit provider system with policies and procedures.**
- communities should ensure that eligibility workers and minor parent case managers are fully informed on intake and eligibility procedures and have access to the rules at all times. New policies should be clearly written and available to all workers who have questions. There are several strategies to do so:

EXHIBIT IV.I

Outreach Strategies — Birth Contacts for Teen Mothers

The state of **Minnesota** has written in their statutory code that the Department of Human Services Family and Children's Services Division are responsible for offering appropriate social services to all women and their new born children. In addition, all hospitals must report the births to minor parents to county social services agencies within three working days after the birth. Agencies must contact minor mothers without case managers and work with them to design a plan. Agencies must also provide case management services as needed to assure that resources and services are available to meet plan requirements.

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IV. Local Implementation of the Rule and Associated Issues (continued)

- *using teen specialists.* As discussed above, some states and communities invest in specialized staff for minor parents. These workers often have a better understanding of the options available to teens. Often, they have smaller case loads which enables them to devote more time to difficult cases. One potential advantage of using teen specialists to carry out intake and eligibility functions is the likelihood that teens will be treated in a more consistent manner given that these workers are usually informed of the particular rules pertaining to minor parents [see Exhibit IV.II]

- *tailored software.* It is possible to assist eligibility workers in the intake and eligibility process by devising "fool-proof," user-friendly computerized systems that help them walk through the process. These systems can help ensure that eligibility workers share information consistently and are asking the right question.

- designing clear intake forms and documents. Another way to reduce intake errors is to support eligibility workers with intake materials that include all pertinent information on them, such as exemptions, etc. [see Exhibit IV.III].

- localities might consider caseworker performance measure programs that rewards eligibility and minor mother case management staff based on the number of minor parents they can draw in. Again, this may be counter to the push to keep the number receiving cash assistance low, but it may provide a

EXHIBIT IV.II

Using Teen Specialists

Rhode Island has contracted with non-profit social service agencies to respond to the needs of minor parents. Anyone who walks into a welfare office who is under 18 is immediately sent to one of five Adolescent Self-Sufficiency Collaborative's (ASSC) which serve pregnant and parenting teens statewide through a network of community service organizations. The ASSC completes a homestudy and intake documents. Once the assessment is done, the ASSC makes a recommendation regarding eligibility and plans for ongoing service.

In **Denver,** minor parents may apply at a local welfare office for public assistance. Intake activities are conducted by an eligibility worker. The case is then transferred to a minor parent case manager for follow-up and completion of the application. Minor parent case managers must follow-up on these cases within thirty days of the teen's date of intake.

In **Hennepin County, Minnesota,** seven intake units are responsible for all TANF applicants. Minor parents are all referred to only one of these units. This unit can make eligibility determinations based on two criteria: either a minor parent has lived on her own for over a year or both of her parents are deceased. If the minor parent asserts that no living parent or legal guardian allows her to live in her or his home, or no adult-supervised supportive living arrangement is available in the county in which s/he currently resides, the intake unit refers the applicant to an adolescent parent worker. There are thirteen adolescent parent workers who handle only minor parent cases.

EXHIBIT IV.III

Clear Intake and Eligibility Forms

Minnesota has developed forms and materials for use by staff and minor parent applicants that clearly explain the adult-supervised living rule as well as its exemptions. Exemptions are clearly printed in eligibility forms to prompt staff. Minor parent applicants are given a copy of the Minor Caretaker brochure even if the minor parent is already living with a parent, legal guardian, other adult caretaker relative or in an adult-supervised supportive living arrangement. The brochure explains the living arrangement requirements for minors, the exceptions to those requirements, the need for referral to social services, and the results of non-cooperation with the requirement.

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teen mother with the support she needs to provide for her baby and herself in the longer run.

VERIFICATION OF LIVING ARRANGEMENT: A CRITICAL JUNCTURE

The process of verifying living arrangements can be associated with multiple implementation issues. At this juncture welfare staff can insert their own opinions and other systems beyond the welfare agency may come into the picture. For example:

- across all communities visited, staff who are the first point-of-contact (FPOC) are responsible for informing the minor parent about the minor mother adult supervision requirement. However, it is not clear that minor parents are always informed of the full range of options and exemptions available to them (parent, guardian, adult relative as well as other approved living situations identified by the state and/or locality);
- several things can happen if a teen is not living with a biological parent. For example:
  - in some communities, FPOC eligibility workers begin exploring good cause (determining if they have good cause not to live with a parent) by looking to see if the minor parent is in another approved situation that is identified in an exemption (successfully living independently, with a responsible adult, in a group home, etc.). Even though the intent may be for a worker to place a call to the parental home at this juncture, or to determine if it is possible to live with a relative, this does not always occur. In these cases, workers are attempting to efficiently expedite the process;
  - in other communities, this triggers an automatic referral to another part of the system for action. For example in California, welfare eligibility staff refer these cases to Minor Parents Services (MPS) to determine if a teen cannot live in the parent's home. In the District of Columbia, these teens may be referred to the Teen Parent Assessment Project in the Family Services Administration to make a determination. In New Jersey, these cases are referred to the Services Unit of the local welfare office.

In most communities, local welfare staff said that they refer those teens denied assistance — as well as those who will or cannot comply with the minor parent living arrangement rule — to other supports (including Food Stamps and Medicaid).[10]

Implementation Issues

There are several issues associated with the above-mentioned activities that may occur at this juncture:

- ways in which individual eligibility workers interpret and describe the minor parent living arrangement requirement can vary across staff. Workers may emphasize living with parents rather than an adult relative, even though this is allowable and is contrary to state and federal policy. For example, in one community, a local welfare official said that "their preference" is for teens to live at home.
- FPOCs have a lot of discretion — this raises the issue of quality control. It is hard to know if early determinations of eligibility are made in a consistent and/or appropriate manner.
- local welfare officials we spoke with indicated that teens who do not live at home usually can find a place to stay — some go home, some move in to another approved arrangement. However, it is not clear that these are good arrangements for young mothers and their children — it is possible that they are not stable or that a new placement may be worse than a previous one, uprooting the minor parent with no advantage to her. Determining the adequacy of current placements is often based on paperwork; in some cases, social service staff are making determinations on the ability of teens to present paper such as lease agreements. Often, these activities are well-intentioned — staff are attempting to facilitate the process. However, to the best of our knowledge, there seems to be little follow up on these placements.

[10] It is important to note that all of the communities indicated that the number of denials and/or decisions not to comply is relatively small. Few localities, however, could actually give us these numbers.

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IV. Local Implementation of the Rule and Associated Issues (continued)

- local strategies that aim to refer all teens not living in an acceptable arrangement to specialized programs for assessment and determination have inherent strengths; it is an attempt to place eligibility determination and assessment in the hands of staff with special expertise. In addition, these strategies can take the burden off of eligibility workers. However, although these systems are in place, referrals often don't occur. Rather, FPOC staff may make an eligibility determination. This can result from a lack of clarity on the policy/procedure, both with the welfare agency or between welfare and the local partner (who receives these referrals). There are also issues specific to referrals to the child welfare system — these are discussed in Section VII.

What States/Communities Might Consider:

There are several steps states and communities can take to ensure that teens who are not living in an approved arrangement upon application for TANF benefits are appropriately supported. They include the following:

- institute follow-up strategies to ensure that teens who move in to acceptable arrangements are in safe, appropriate housing for young families. Strategies that provide case management to all minor parents on TANF that are not living with a biological parent, regardless of living arrangement, may be one way to do this. Such efforts are in effect in California, Washington, DC and Rhode Island [see Section V].
- institute clear, concise policies that describe steps to be taken when a minor parent is not living with a parent, guardian or adult relative and "how far the FPOC can go" in making eligibility determinations. Does this require:
  - a call to the parental home, even if they are in another accepted arrangement as identified in an exemption;
  - referral to another agency to carry out next steps (who then usually makes contact with a parent and/or conducts some form of assessment); or
  - assessment procedures by the FPOC, either of the parental home or current living arrangement.
- when multiple systems are used at this juncture to complete determinations:
  - ensure that all partners in the system are clear on these procedures. Periodic cross-agency training is critical and can ensure that all systems interpret procedures in a similar fashion;
  - consider implementing outreach strategies to ensure that referrals do happen. Agencies that are to receive these referrals should be given lists periodically of all minor parents receiving TANF. This is one way to make sure that these teens are in compliance, their arrangements are, in fact, safe and that no problems arise during re-certification (like a teen being denied assistance for being out of compliance)[see Exhibit IV.IV]; and
  - consider co-location of staff of these different systems to facilitate the referral process.

EXHIBIT IV.IV

Reaching Out to Minor Parents

In Washington, D.C., the **Teen Parent Assessment Project** works closely with the Income Maintenance Administration (IMA - welfare) to ensure that all minor parents are complying with the living arrangement rule and are provided with the support they need. Teen Parent Assessment Project staff receive lists from IMA periodically of all minors on the TANF caseload. With this information, they conduct outreach to minor parents, assess the living environments to determine if it is an approved arrangement and share this information with IMA for determinations. Case management services are provided to those under 18 who are not living with a biological parent (see Section VI on case management models) and offer home assessment and case management services.

Minor Parent Services, in San Diego conducts similar activities. Lists or all minor parents on CalWorks are received from program staff for follow-up. MPS staff conduct outreach, assess living arrangements and share information related to eligibility with welfare officials. In addition, MPS provides case management to select group of minor parents living with ineligible adults.

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ASSESSMENTS TO DETERMINE GOOD CAUSE

Assessments are often used to complete eligibility determinations for teens who are not living with a parent, guardian or adult relative not denied during initial discussions with staff and who choose to move forward in the application process. Assessments of several types can take place depending on how a state or community implements the rule. This may include:

- an assessment of the parental home to determine if it is safe for those teens that say they cannot live there; and
- an assessment of the current living arrangement to determine if the teen can continue to stay in her current placement if it meets an exemption requirement.

This evaluation is done by different staff in different localities. Some welfare departments use their own social workers staff. Others have contracted with community groups and non-profit agencies to conduct assessments. Yet others refer to the child welfare agency. These strategies varied across the states and communities we visited. However, in all of the states we visited, assessment occurs by some specialized unit. Localities relied on one of the following:

- welfare staff that only work with minor parents;
- specialized staff situated elsewhere in the public system that have backgrounds in adolescent parenting, social work or mental health; or
- non-profit community-based providers.

None of the communities in states we visited rely on generic welfare staff or child welfare staff to carry out these activities. There are considerable benefits to using specialized staff — these are professionals that may be more sensitive to the needs of this population, have more expertise and, in the case of non-profit agencies specifically, are seen by teens and their *families* as more impartial and closer to the community.[11]

Implementation Issues

However, our conversations with informants in participating communities raised a number of issues related to assessment practices. The most obvious concerns had to do with the ability of staff to make decisions that are in the best interest of the minor parent and her child:

- workers often must decide whether or not to refer a case to child protective services. In all of the communities we visited, those responsible for assessment activities refer these cases to child welfare when there is evidence of abuse and/or neglect. However, this is often difficult to determine — neglect is closely associated with poverty. In addition, staff are hesitant to do so given the fear that a mother may be separated from her child.
- the number and type of allowable exemptions, as well as the availability of other options in the community, seem to influence the direction and rigor of assessments (as well as determinations). For example, based on our observations, if policy allows a teen to live independently and there are no other options other than a referral to child welfare, an assessment and determination may emphasize reasons why a teen should be allowed to live alone.
- while state policies often identify what makes up a suitable living arrangement, communities must develop tools to conduct these assessments (either of the parents home or the current arrangement). Some agencies have developed assessment tools (both public and private) to ensure that appropriate and consistent decisions are made. These tools are often borrowed from child welfare agencies. [see Exhibit IV.V].

[11] Contracting assessment activities out to a non-profit may also be less expensive and could reduce the burden on local welfare staff. One local welfare office originally planned to use a non-profit to carry out assessment activities as well as case management for teens not living with a biological parent due to the assumption that there would be many cases in which minor parents could not live with a parent, guardian or relative. They decided to use public staff when this turned out not to be the case.

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EXHIBIT IV.V

Conducting Assessments of Home Environments

In Washington, D.C., the **Teen Parent Assessment Project** case worker is responsible for assessing minor parent living arrangements. This could be of the parent's home or where the teen is currently living. Assessment strategies include:

- interviewing the teen parent to assess her current ability to care for herself and her child;
- talking with any adults in the home with whom the teen parent may be residing to determine if the adult has a supportive relationship with the teen parent;
- checking on living arrangements, sleeping accommodations, and adequacy of the home for the teen parent and her child;
- inquiring about why the teen parent is no longer residing with her parent or guardian;
- talking with the teen's parent or guardian to discuss the relationship with the teen parent and problems that caused the teen parent to stop residing in the home of the parent or guardian; and
- determining whether there is a potential for abuse by the adult in the home and/or neglect in the care of the teen parent's baby.

- when child welfare staff carry out these functions, a minor parent's case can be considered "like all other open child protective service cases." One local official suggested that this is not in the best interest of the minor parent given that a record is established that might influence actions taken by other systems, etc. Our informant suggested that, "welfare may see these teens as different but others will not."

What States/Communities Might Consider

States and communities may consider a number of activities to strengthen assessments of living arrangements. These include:

- providing local welfare staff with assessment areas and/or tools as well as training on using various strategies;
- using staff that have assessment expertise and/or relevant backgrounds;
- coordinating with other entities that work with minor mothers to access arrangements. These may be minor parent providers in the community who have relationships with young mothers and are fully aware of their living situations. However, this requires a tightly coordinated minor parent provider system;
- carefully considering the issues when child welfare has the responsibility for assessment including how these cases are described, identified and referred to in the system.

Making Determinations

Ultimately, a decision is made as to whether a teen parent must live at home, with an adult relative or some other adult-supervised setting or independently. If a teen will or cannot comply, she can be denied assistance. There are a number of legitimate reasons why teen parents might not choose to, or be able to, live with their parents:

- the most obvious reason is that they would be unsafe. In some situations, parenting teens are physically and/or sexually abused by the family members with whom they live. In addition, almost all of the teen parent service providers we spoke with indicated that many of the teens they worked with had been abused. Providers suggested that there is a high incidence of under-reporting of sexual violence and physical abuse for this population. Providers suggested that a teen parent may not report such behavior for fear of retribution from the guilty party, immigration issues, etc., and may choose to walk away from services.
- overcrowding is another major reason that a teen parent and her child may no longer be welcome at her family's home. Often, adding another person to an already full house may be extremely burdensome. In some places, such as Camden, New Jersey, many families on public assistance are leasing their homes. A significant number of these leases have occupancy limits prohibiting families from adding additional children to those residing in the home.

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IV. Local Implementation of the Rule and Associated Issues (continued)

- in addition to physical overcrowding, a new baby in a family is a huge financial burden. Many teen parents do not want to or can not ask their family to pay the costs associated with a baby.
- finally, some providers suggested that teen parents can not live at home because their parents are extremely angry with them for "getting into trouble." They've made a decision not to care for their defiant teen.

Implementation Issues

It is difficult to determine what happens to teens at this juncture due to limited data at the local level. However, our discussions with community informants raised several issues:

- as mentioned earlier, determinations are often made in light of what else is available for the minor parent. If a worker knows that the teen cannot return home and has no where to turn, there is pressure to approve her living independently or in some other arrangement that may or may not be long-term;[12]
- it is not clear if additional supports are needed when teen parents do return home. These teens and their families would, in fact, receive TANF case management in the ways in which their localities provide this support. One local welfare official suggested that they "try to refer the re-united families to counseling." If these referrals do occur, they are voluntary on the family's behalf;
- when teen parents do return home and are "nested" in a larger assistance unit, they can become "invisible" to the provider system;[13] and
- if teens are denied assistance, most local welfare officials we spoke with suggested that they try to link them with supportive services. However, if these referrals do occur, this is voluntary on the teen's behalf.

What States/Communities Might Consider

At a minimum, communities should, closely coordinate with community-based service providers to facilitate referrals for teens that are denied assistance or choose not to comply. Support "one way" referrals by sharing contact information for those teens falling into this category so that follow-up can be conducted by programs outside of the welfare agency.

Summary of Major Implementation Issues and Recommendations: Checklist for Federal, State and Local Welfare Officials

In summary, there are several major issues associated with implementation of this rule — either specific to certain functions or the entire process. Issues raised in communities we visited may be relevant to efforts in localities across the country. These include:

- it is easy for minor mothers to receive inaccurate information about the adult-supervised living rule. Much of this has to do with language used to describe this provision — the words "live-at-home" are often taken literally suggesting that other options are not acceptable and exemptions are not possible;
- the non-profit teen parent community in these communities were not well informed of local policy, process and procedures. As such, their ability to ensure that teens are fully aware of major issues and the intent of the law is somewhat limited;

[12]It should be noted that we visited communities where staff other than the child welfare system are involved in making determinations. These staff are hesitant to refer to the "already overburdened" child welfare in fear that the teen may be separated from her child. These issues are further discussed in Section VII on Child Welfare issues.

[13]Although states are having to develop strategies to identify these nested cases to enforce TANF minor mother provisions.

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IV. Local Implementation of the Rule and Associated Issues (continued)

- when more than one public agency or departmental unit is involved in the implementation process, there is major room for error due to differences in perspectives, philosophy and referral systems between partners; and
- the presence of adult-supervised facilities in the community can effect how local welfare officials make decisions.

There are several things that federal officials, states and localities may consider to address implementation issues raised in this report. They include the following:

- refrain from calling this provision the "live-at-home rule." Rather, consider more careful language — like the "minor mother adult-supervision rule" — which reflects the true intent of the law and does not confuse teens or provider systems on what is acceptable.
- clarify for eligibility workers how to address the "tiers" of approved living arrangements when conducting intake, eligibility and verification functions. Produce clear procedures for whether local welfare staff can screen for all approved living arrangements at once (parent, guardian, adult relative as well as all other approved arrangements like second chance homes, responsible adult, etc. This, in essence, is collapsing the tiers which often happens in practice), or whether they must first rule out the possibility of living in first tier situations (parent, guardian, adult relative). This can reduce the burden on eligibility workers (by not requiring assessments, for example, for teens not living at home) and facilitate consistent implementation of the rule at the local level.
- consider investing in case managers for minor mothers on TANF. These staff, who only work with minor mothers, may be better equipped to implement this rule, as well as others associated with minor mothers, given that they can focus on these specific issues. Otherwise, we are asking eligibility workers that support other TANF recipients beyond minor mothers to familiarize themselves with policies and procedures that are relevant to a small fraction of their caseload. In addition, teen parent case managers are easily identified by partners outside of the welfare system which can facilitate coordination across systems.
- carefully consider strategies to ensure that eligible minor mothers receive accurate information on this rule. This includes supporting welfare staff appropriately as well as informing the provider system on policies and procedures. This may be done by disseminating material on the rule, exemptions and alternative housing options in the community.

For those teens that cannot live with a parent, legal guardian or an adult relative and who do not meet other state and/or local exemption policies, the absence of safe, stable housing is a barrier to TANF receipt. While the majority of community informants suggest that minor parents can find a place to live, program officials and service providers alike agreed

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V. LOCAL STRATEGIES TO PROVIDE ADULT-SUPERVISED LIVING

that living arrangements are often short-term and may not be the best options for raising young children. For these reasons, exploring housing strategies for this population and providing various residential options may be critical to any effort which aims to support and strengthen young families. In addition, the presence of housing options in a community has an effect on how localities implement the minor parent living arrangement requirement.

This section of the report summarizes the definition of adult-supervised living, strategies used by communities we visited to provide alternative living arrangements as well as the reported perceived benefits and strategies associated with them.

Models of Adult-Supervised Living in SEEKING SUPERVISION Communities

Adult-supervised, supportive living, as defined by the law, is one in which minor parents are required to learn parenting skills, budgeting and other skills to promote their long-term economic independence and the well-being of their children. This includes, the law states, "a second chance home, maternity home, or other appropriate adult-supervised supportive living arrangement." States have begun to identify adult-supervised arrangements deemed acceptable for minor mothers and their children. These include:[14]

- group homes serving minor parents that are not part of the child welfare system;
- apartment style models that are more geared towards independent living;
- private residences that are not foster home placements;
- the home of a non-relative adult;
- supervision, through intensive case management, for teens who are living independently; and
- foster care placements including group homes or foster family homes.

CAPD was able to visit communities that have implemented various strategies as described above. Below, we briefly discuss three specific types of adult-supervised settings — group homes, apartment style models and private residences.[15] Case management strategies are discussed in Section VI. Foster care is discussed in Section VII.

Group Homes

Group living arrangements offer a structured environment for young mothers and their children. They can deliver varying degrees of supervision and may be used for emergency, respite, residential and transitional care. These facilities also provide environments conducive to housing minor parents with special needs (e.g., intensive mental illness, substance abuse, physical disabilities of the young mother or child, etc.).

[14] *For a detailed description of state policy around these issues,* **Seeking Supervision: State Policy Choices with the TANF Teen Parent Living Arrangement Rule,** *CLASP, 1999.*

[15] *This is just a cursory review of these facilities as we observed them in participating communities. For a comprehensive discussion on Second Chance Homes — of which can be group homes or apartment style — see* **Seeking Supervision: Second Chance Homes and the TANF Minor Teen Parent Living Arrangement Rule.** ***SPAN, 1999.***

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V. Local Strategies to Provide Adult-Supervised Living

Two of the communities we visited have, and one is currently building, specialized group homes for minor parents and their children who were not part of the child welfare or juvenile correctional systems. [see Exhibit V.I]. Providers we spoke with offered the following about the benefits of congregate living facilities:

- they offer the supervision necessary to support younger teen mothers. Staff indicated that group homes allow you to "watch" teens and their child-rearing practices carefully and exert more control over their daily activities;
- the environment is conducive to peer exchange among the residents around such areas as child-rearing and healthy relationships. Several staff suggested this is critical given that teens rely heavily on the opinions and judgements of their peers;
- congregate living offers the structure necessary for young women, many of whom have been victims of abuse, to feel safe and secure while still allowing for the space teens need to further develop; and
- they provide the opportunity to place them in environments conducive to a particular program's philosophy. For example, when based in the community, they provide access to key supports like transportation, child care, and food stores. This is key for programs that emphasize the development of independent living skills. However, some staff suggested that placing such facilities outside of certain communities may also be important when there are concerns about keeping teens away from gangs, abuse and violence.

These facilities had some characteristics in common. For example, nearly all of them utilize a "tier system" — that is, minor parents enter a facility on a particular level. Based on factors such as progression on self-

EXHIBIT V.I

Group Homes for Minor Mothers and Their Children (non-foster care)

Genesis House I, operated by the **Detroit Rescue Mission** in Detroit, MI., serves up to eight homeless pregnant or parenting teens ages 16 and 17 and their children. Teen mothers with substance abuse problems are accepted. Length of stay is up to 24 months. Housing is provided in four large bedrooms — the facility also includes a family room and dining room. On-site services include daily living skills training, employment and education assistance, individual/family/group counseling and service coordination to meet the teen parent's needs. Fathers are able to receive assistance in parenting as well. Funding sources include HUD's Supportive Housing Program. Genesis House I is currently applying to become a licensed group care facility — plans are to at this time to expand service to sixth through ninth graders. The Detroit Rescue Mission also operates Genesis House II, a transitional housing program.

Bridgeway in Denver, CO., provides housing for homeless young mothers over the age of 16. Teens must be pregnant upon application — custodial teen parents are not eligible for the program. Housing is provided in a three house facility on one property for up to 10 residents. Residents can stay up to 18 months. Programming includes over 104 classes per year focusing on career options, employment skills and life education in addition to nutritional guidance and links to prenatal care. Critical one-on-one support is provided by a Bridger — each young mother is linked with one of these volunteers who commits to spend 10 hours a month to serve as an advocate, mentor, role model and friend. Funding sources include HUD's Supportive Housing Program and Community Development Block Grant (CDBG) funds.

One of the **New Opportunity Homes**, Rhode Island's new state-wide system of second chance homes, will be a group care facility for four minor mothers. Residents are allowed to stay in the congregate home until the age of 18 or until they are ready to move to the next Level Facility which is an apartment model. Funding sources include TANF dollars as well as matching dollars raised by the Collaborative .

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V. Local Strategies to Provide Adult-Supervised Living

identified goals or in education, teen may "graduate" to a higher level within that program that is rewarded in some way (more independence, higher allowances, etc.). However, these facilities also varied greatly on a number of dimensions including eligibility requirements, length of stay, funding, and strategies to link teens and their children to key services.

Apartment Style

Two of the communities we visited utilized apartments to provide adult-supervised living to TANF minor parents — a third community is planning to open such a program in the near future. [see Exhibit V.II][16] These providers — whether utilizing co-located (all units are in one building) or scattered-site (units in a variety of buildings) apartments — offered the following as benefits of this model:

- apartment models provide minimal supervision for those that are either older and/or are closer to a transition to independent living. These teens get to "practice" such skills as meal preparation, household chores, etc.;
- they permit privacy, particularly with one's own child;
- this strategy offers some peer support (namely in co-located models and those that house two teens together in one apartment);
- it may be easier to get these models up and running;
- scattered apartments, if they can be found, make it easier to provide supports in the teen's own community and to cover a larger geographic area;
- these dwellings are integrated in the larger community. As a result, as one teen put it, "no one knows that I'm different — I look like everyone else;" and
- in scattered-site models, it is sometimes possible for the minor parent to stay in the dwelling when she ages out of the program.

EXHIBIT V.II

Apartment Models for Young Families

MIA House II is operated by the Lula Belle Stewart Center in Detroit, MI. This 16 unit apartment complex serves 16-17 year olds and their children -- priority is placed on minor mothers who are eligible for TANF but do not have adult-supervised living. Renovations to the facility were funded by the W.K. Kellogg Foundation and completed by teen fathers working in partnership with skilled tradesman. The program is designed to meet the needs of more experienced and mature minor mothers. Child care is offered at a licensed center operated off-site by the agency. Additional supports include individual counseling, group therapy, case management, parenting education as well as family counseling. Funding for this facility includes HUD Supportive Homeless funds.

MIA House II is one of several apartment buildings owned and operated by the agency. MIA House I is a transitional living program for young mothers between the ages of 18 and 21. Young women "graduating" from these two facilities have the opportunity to move into a third property that rents to the general public as well as other populations. Rents collected from this property are used to subsidize both MIA House facilities. When young mothers enter this public facility, they can still receive supports from Lula Belle Stewart staff.

Archdale Apartments in Minneapolis, MN., provides independent and transition living for homeless youth ages 16 to 20. Four of the 30 units are set aside for minor mothers and their children. The building is staffed 24 hours a day for immediate support, crisis referral and information and referral. In addition to the co-located apartments, six scattered site apartments are set-aside for this population. Archdale is a collaborative effort between the Bridge for Runaway Youth, Inc. and the Central Community Housing Trust. Funding sources include HUD and the Minnesota Departments of Economic Security and Health and Human Services as well as private funders.

[16] *We also were able to observe apartment-style programs serving court-appointed youth as well as older teens transitioning to independent living. The opinions of these providers and our observations of these programs are reflected here as well.*

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As one would expect, the level of supervision is the major issue facing providers when it comes to apartment models. One provider indicated that, "it is great when the teen is ready." Upon closer analysis, there are other challenges related to this model:

- it may be more difficult to conduct group activities (namely due to lack of space); and
- there is less access to children in these facilities when compared to congregate care arrangements.

In addition, utilizing apartments requires working closely with landlords and the broader housing arena, particularly if the provider does not own the facility. Communities we visited, however, were able to both find willing landlords to rent to young mothers as well as own their own property.

MENTOR HOMES: USING PRIVATE RESIDENCES TO SUPPORT YOUNG FAMILIES

Several of the communities visited use, or are planning to use, private residences to house homeless teen moms. [see Exhibit V.III]. These residences may be thought of as similar to foster care except they are not certified foster parents and do not serve minor parents in the child welfare system. For the purposes of this report, and to distinguish them from foster homes, we refer to this type of arrangement as a "mentor home."

Of these programs:

- three of the sites specifically designed these systems to support TANF minor parents (two are in one state that chose this option);

EXHIBIT V.III

Supporting Minor Mothers in Private Homes

The Teen Mother's Program in Detroit, MI., a partnership between the Pastor's Fellowship of Metropolitan Detroit, Inc. and "Host Families," is designed to provide emergency and transitional care to minor parents and their children in the Host's home. Host Parents are reimbursed $150 per month for emergency stays (up to 14 days) and $200 per month for transitional care (up to 18 months) for food and shelter. Minor parents also use a portion of their TANF grant to pay rent. Host Parents agree to be the third party payee for the teen. Funding for Host Parent reimbursements comes from a small state FIA grant. In addition, FIA provides in-kind support including office space, phones and faxing services. The Fellowship pays for staff salaries.

The Host Home Program of the Latin American Youth Center in Washington, D.C., is a small program working in partnership with a faith-based group to provide housing to homeless teens between the ages of 13 and 18. Parental consent is required to participate in the program. A few minor mothers and their children have been served. Funding comes from the Basic Center portion of the Runaway and Homeless Act. Host Home providers are reimbursed $100 per week for food and the cost of housing. Care is provided for up to two weeks or longer if possible.

The Alternative Adult Supervised Supportive Living Arrangement (AASSLA) Program is New Jersey's model of second chance homes. As a result of welfare reform, New Jersey has contracted with three non-profit agencies to develop and coordinate 60 private homes across the state for minor mothers in need of this assistance. These same three agencies have state contracts to provide foster care placements. As such, it mirrors foster care in many ways; homes are provided the same training and are reimbursed based on the state's foster care rates. However, the administrative costs of contracted agencies as well as reimbursements to providers are funded by TANF. Mainly through coordination with community providers, minor mothers in these residences will be linked to educational, medical, health and mental health services as well as life skills training.

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- one site uses these homes to house homeless teens, not just teen mothers; and
- two of these programs are actually up and running.

These programs are common in that they all are attempting to borrow strategies from, and share materials and strategies with, foster care programs in their communities. These programs are not receiving foster care reimbursement. However, they range in program capacity, requirements for adults in participating homes, length of stay and funding.

Providers of these facilities identified benefits of mentor homes as the following:

- as one would expect, these models provide a family atmosphere. Some providers indicated that it may be the first time some of these young mothers are in a stable, supportive family environment;
- mentor parents can model appropriate parenting and child-rearing behaviors for the young mother;
- these facilities are easy to start-up — beyond recruitment and training, there are no excessive costs and delays associated with the development of properties; and
- using private homes provides some flexibility for the teen to remain in specific geographic areas. To the extent that this occurs, a minor parent can be placed in an area that does not require major relocation. In this way, teens do not have to switch schools or leave familiar surroundings.

Our observations suggest a number of challenges associated with mentor homes as well. Many of these are similar to serving minor mothers in foster homes (as described in Section VII). Implementation issues of note include the following:

- the inability to fully control what happens in the home environment. This issue is not only related to the safety of the minor parent and her child, but the inability to control the "teaching" and/or modeling responsibilities of mentor parents. For these reasons, it is essential to provide training and support to providers as well as to implement alternative strategies for young mothers to develop parenting and independent living skills like support groups, etc.
- recruiting mentor providers. Each of the communities we spoke with rely on the foster care system in some way to find providers — often they are foster parent candidates that chose not to participate in the child welfare program for one reason or another.
- fear regarding safety and liability issues. These concerns were not raised by mentor program sponsors but others that we discussed this strategy with. Because this is a relatively unknown model, there is legitimate concern about their safety and who would be responsible if something were to happen to a minor. It is important to say, however, that each of the programs illustrated here require parental consent before a placement occurs and training and background checks are crucial.

In summary, this model has the potential to substantially expand a community's capacity to provide supportive arrangements for young mothers in need. It is important for the policy and program service provider community to continue to monitor these experiences. A more detailed discussion of one model, the Teen Mothers Program in Detroit, is described in Exhibit V.IV.

Overview of Three Adult-Supervised Models — Major Issues and Considerations

Upon closer analysis, there are several challenges facing communities that aim to provide accessible, supervised living to TANF teen mothers. Key among them is the lack of facilities for those that are truly homeless — this is a direct consequence of major funding barriers that limit communities in their ability to provide safe havens for young families:

- Communities are not fully aware of the funds available to support residential models. This became clear to us as we discussed living arrangement models and strategies with welfare and community-based staff across the country.

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EXHIBIT V.IV

Pastor's Fellowship of Metropolitan Detroit, Inc. Teen Mothers Program: A Closer Look

The Fellowship designed the Teen Mother's Program in response to a request from Governor Engler for the religious community to assist in addressing issues related to teen pregnancy. It prioritizes minor mothers that are in need of public assistance who have pending applications because they cannot locate appropriate adult-supervised housing. Teens must be at least 16 years of age and must obtain parental consent to participate. Host Parents are recruited from the consortium of 11 congregations that make up the Pastor's Fellowship. The program currently involves approximately 10 Host Homes.

The program originally provided emergency placement for minor mothers for up to 14 days. This short window was just enough time for staff of the Wayne County Family Independence Agency (FIA) to determine good cause for minors who did not live with a parent, guardian or adult relative. However, staff of the Teen Mother Program quickly saw the need for longer-term placements, particularly in the cases where young mothers and Host Families were creating healthy relationships. As a result, transitional care is now provided for up to 18 months.

Host Parents receive an assessment and all residents of the home must submit to criminal record checks and central registry clearances (child protective services). Host Parents must agree to participate in six weeks of comprehensive training which is designed to address issues associated with teen pregnancy and parenting. The curriculum focuses on teaching young mothers life management skills, accessing health services resources and parenting. In addition, Host Parents are instructed in FIA Minor Parent policies as well as child protective policies. Program staff indicated that the training borrowed from that provided to foster parents. Upon completion of the training, each Host Parent is presented with a certificate of completion and may receive a placement.

Program staff — two of which are employees of the Fellowship — are housed in the same building as FIA staff that work with homeless minor mothers allowing for close coordination between the two programs. Staff include a part time volunteer Program Administrator, a Case Coordinator and a Program Secretary.

The Case Coordinator provides case management supports to participating teens and visits teens in the Host Home periodically, depending on the status of the teen. Minor mothers who are in the transitional program are linked to parenting classes. Teens are responsible for finding their own child care.

- Some communities may target flexible dollars, like homeless funds, to adults on the premise that homeless minors are the responsibility of the child welfare system. This decision can be made without an awareness of the child welfare system's capacity to support young families;

- In some instances, state regulations on the placement of children can create barriers to serving our youngest minor parents. For example, in one midwestern state, group care facilities cannot serve youth under the age of 16 without obtaining a child placement agency license. Licensing may bring the need to make costly upgrades to a program's facility or staff;

- The categorical nature of some funding streams can prohibit the development of quality living arrangements for this population. For example, some federal funds target youth 16-21. Flexible dollars — like TANF and homeless funds, are necessary to fill the gaps created by categorical funding.

- Another barrier to serving teens that are not wards of the court is how to treat parental consent. Some communities we visited were not aware of ways to support teens who are not court wards. However, others have done so by seeking parental consent for their child to reside in an adult supervised facility. As such, teens enter facilities on a voluntary basis. This can be problematic, not only in getting parents to agree to a child's placement, but also gaining their cooperation on treatment plans, etc.

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V. Local Strategies to Provide Adult-Supervised Living

- Few communities have a range of options that provide supervised, structured supports for those in need as well as semi-independent living for teens who are ready for this transition. Wayne County (Detroit) is one community where we saw this range available — this is described in Exhibit V.V. Rhode Island is also attempting to put such a continuum in place for this population.[17] Supporting such a range requires flexible resources, like HUD homeless or TANF funds (those with less age restrictions, etc.) as well as substantial collaboration.
- Most of the communities we visited expressed an interest in assistance on building facilities for minor

EXHIBIT V.V

Teen Parent Empowerment Collaborative's Supportive Housing Program

Wayne County, Michigan

The Teen Parent Empowerment Collaborative's Supportive Housing Program serves single pregnant and parenting minor teen parents under the age of eighteen. It prioritizes those teens who are financially eligible for cash assistance but unable to find an appropriate adult supervisor. Twenty-five percent of the minor's cash grant is secured for room and board. All teens must attend school full-time in accordance with policy of the Family Independency Agency (FIA).

The Collaborative is a partnership between the Wayne County FIA and seven non-profit teen parent providers — all but one of these community-based organizations provides housing supports. The programs are in different stages of development but the partners have planned a system of care to address the varying needs of young families. They include:

- the Teen Mothers Program, which s emergency and transitional care in private residences (as described in Exhibit V.IV.);
- St. Vincent and Sarah Fisher Center, which serves five minor parents in transitional group care;
- the Detroit Rescue Mission, an eight- bed group home serving 16 and 17 year olds. Upon licensure, it will expand services to eighth and ninth graders;
- the Federation of Youth Services which plans to serve less stable 16 and 17 year olds in group care;
- Catholic Social Services will have the capacity to support 16 minor mothers 16 and 17 years of age in group care;
- the Lula Belle Stewart Center which provides housing to more mature 16 and 17 year olds in apartments; and
- Alternatives for Girls which will provide supports to 16 and 17 year olds that cannot participate in a housing program as well as 18-21 year olds not served by the aftercare components of any of the Collaborative's programs.

All of these programs have a history of supporting minor mothers. However, in response to the minor parent adult supervised living requirement, they organized ***through the leadership of the Wayne County FIA,*** and was able to obtain $2.8 million from the HUD Supportive Housing Program. These dollars were used to leverage existing and matching funds to coordinate and expand housing programs for young families in the greater Detroit area.

One major task of the Collaborative was to design a system of intake and referral between the FIA and participating providers. During the TANF application process, the FIA Teen Parent Empowerment staff determines if minors are eligible through an assessment. Based on the teen's particular needs, a referral is made to one of the programs.

Collaborative meets periodically to address implementation issues and specific cases. Many contribute the success of this program to the vision, commitment and leadership of the Director of the Wayne County FIA and staff.

[17] *For a full description of the Rhode Island model,* Seeking Supervision: Second Chance Homes and the Minor Teen Parent Living Arrangement Rule. *SPAN, 1999.*

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parents. Yet many of the people we spoke with don't know the extent of need for alternative arrangements or where to start in determining this information.

- Most communities we spoke with discussed the lack of options minor parents have after they reach age 18 and "age out" of the foster care system or when the adult-supervised living rule of TANF no longer applies.

These challenges require a commitment to the minor parent provider system — both public and private non-profit — to understand the extent of homelessness among the minor parent population, determine what models of supervised living best address the need and to effectively coordinate the funding available to support young families in this manner.

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VI. INTENSIVE CASE MANAGEMENT FOR MINOR PARENTS ON THEIR OWN

As mentioned earlier, a major challenge facing communities that aim to provide accessible, supervised living to minor parents is the lack of facilities. Given the limited availability of residential options, a number of communities have chosen to support minor parents, who cannot live at home or with a relative, by providing intensive case management.

These types of supports are critical for minor mothers. Well-trained, effective case management has the potential to facilitate the development of adolescent parents' into mature and responsible adults. In addition, there is wide-spread agreement that the single most critical source of support adolescents must have is a stable, caring relationship with adults." Although other program staff also provide support, case managers are in an optimal position to fulfill this need for a caring, stable relationship.[18]

In earlier sections, we've discussed the benefits of using minor parent case managers to ensure that young families receive TANF. *However, CAPD suggests that case management is absolutely essential for these minors that are not living in a structured setting:*

- it can give them the structure they need to succeed by virtue of maintaining a consistent schedule of meetings with a responsible adult;
- it may increase the likelihood that a minor parent and her child can stay in her current living arrangement, particularly if supports focus on the entire household;
- it can link these teens to critical parenting, child care and educational services; and
- if properly designed, it can support and bolster the development of independent living skills.

Several of the communities we visited have developed case management models targeted to those teens that are either not living with their parent (but in some other approved arrangement, like an adult relative) or are living independently. This typically entails a level of service above and beyond case management supports provided to other TANF recipients. These programs are illustrated in Exhibit VI.I.

Two major issues that result from our discussions with informants for those teens not living in an adult-supervised setting include the following:

- case managers are reluctant to be the "payees" for the minor parents. This means that teens get their benefits directly. This can be a disadvantage for young parents in those states/communities that require a third party payee and who have not learned skills such as budgeting; and
- given that they are not in a congregate facility, there is the possibility that there will be fewer opportunities for group activities and peer support.

What Communities Should Consider

Research suggests that all minor parents would benefit from quality case management supports, regardless of welfare status and without such broad sets of supports they may end up on assistance. Communities may consider targeting those teens that are on their own for more intensive services. It is critical for these services to meet field-established standards to reap the full rewards of such an investment.[19]

[18] *CAPD*, School-Based Programs for Adolescent Parents and Their Young Children—Overcoming Barriers and Challenges to Implementing Comprehensive School-Based Services, *October 1994, p.34*

[19] *For a detailed description of case management models for teen parents including criteria for caseload size, staffing and program intensity, see* School-based Programs for Adolescent Parents and Their Young Children: Guidelines for Quality and Best Practice. *CAPD. October 1996.*

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EXHIBIT VI.I

Case Management Models for Minor Mothers and Their Children

In **Los Angeles**, all minor parents, not living with their parents but living in an approved setting, are offered case management services by the **Minor Parent Services Unit**. Case managers visit clients twice a month for the first three months. From the fourth month on, there is one visit a month. Case management is available until age 18 but, except for one visit to assess safety, is not mandatory. This unit is comprised of three case managers, each with a caseload of thirteen minor parents. Since the program began in June 1997, there have been approximately 100 cases.

In **San Diego**, case management is offered by the **Minor Parent Service Unit** to all minor parents who are allowed to live independently or with non-eligible adults and friends. While they can refuse services according to the local welfare official, they are strongly encouraged not to. Case management is available until the age of 18. Minor parents can continue with voluntary contracts when they are no longer eligible. There is one case manager with an average caseload of 25-30 families at any time. The program calls for monthly, face-to-face contact with the minor parent and her child(ren).

The Teen Parent Assessment Project is operated by the District of Columbia Family Services Administration of the Commission on Social Services. A major mission of the project is to provide case management and support services to teenagers who receive TANF benefit and are not residing with a parent or legal guardian to assist them in developing goals and achieve self-sufficiency services for some teen parents are mandatory. This includes helping teens who have dropped out of school locate and reenter a school or GED program; connecting teenage clients to community-based programs and services such as day care services and counseling programs; and, providing information and counseling about contraception to help teenagers understand the need to postpone additional pregnancies. The project is composed of two social workers, two social service representatives, and a program assistant. There is an active caseload of approximately fifty (50) cases and an average caseload of fifteen (15) cases per social worker. Weekly contact with the clients is required.

In Michigan, **Mothers Overcoming Many Many Adversities (MOMMA)**, sponsored by the Alternative for Girls, is part of the Teen Parent Empowerment Collaborative Supportive Housing Program. It was created to serve 16 and 17 year old minor parents who are unable or unwilling to be served by the housing providers in the collaborative and do not have a secure place to live. It also serves 18 to 21 year old minor parents who are not served by the aftercare components of these providers. Participants of MOMMA get case management which includes, initially, weekly contact but decreases after the client becomes secure. Case management, which includes independent living skills, education support and employment assistance, can continue for up to two years. Staff use a combination of in-agency, home visits and group activities to implement the curriculum. The program is self-paced.

In Rhode Island, **the Adolescent Self-Sufficiency Collaboratives (ASSCs)** assist the Department of Human Services in facilitating appropriate adult-supervised living arrangements for all minor parent TANF recipients through ongoing observation and evaluation of their current living arrangements and through the provision of intensive case management. Case management consists of frequently scheduled home visitation focused on family budgeting, health care, nutrition, parenting education and life-skills development to promote the long-term economic independence and well-being of the minor parent and her children. This includes access to programs where participants learn and practice pre-employment/ work maturity skills and where they explore vocational options and participate in community work experience settings matching their skills and interests.

In addition, it is critical to link minor parents living independently to programs and supports that aim to build independent living skills and peer group activities. While a case manager has the opportunity to teach independent living skills, it is also important for minor mothers to interact perhaps say, with each other for support and learning opportunities.

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VII. WELFARE AND CHILD WELFARE INTERFACE ISSUES

The TANF adult-supervised living requirement encourages a new type of partnership between the welfare and child welfare systems in many communities across the country. The TANF provision requires welfare officials to make determinations about the appropriateness and safety of home environments — a task traditionally falling to child welfare officials. For this reason, state and community officials of these two systems are beginning to work together to share resources and expertise. As we point out below, however, there are issues associated with these partnerships. This section discusses ways in which these systems are working together, implementation issues raised by discussions with welfare staff in select communities, and foster care strategies for minor mothers we observed.

Emerging Welfare/Child Welfare Partnerships — Facilitators and Challenges

We've seen local welfare and child welfare systems — guided by state TANF policy — work together in a number of ways:

- welfare officials refer minor parent cases directly to child protective services when TANF eligibility activities raise the possibility of abuse and/or neglect. The child welfare agency takes over responsibility of the client if an allegation is founded.
- TANF "taps the expertise" of child welfare staff by requesting their assistance in assessments of the parental home to determine good cause for exemptions or sharing information as to whether or not there have been previous protective service investigations related to the teen's case. Welfare officials then make a determination of what action should be taken to best serve the minor parent.
- TANF can "piggy-back" a system of adult-supervised living onto the child welfare system by identifying and supporting "mentor" parents, similar to foster care parents. For example, New Jersey's Division of Family Development contracts with three non-profit foster care agencies to develop sixty adult-supervised placements in anticipation of this need.

In addition to these points, the welfare and child welfare system share another point in common; our informants suggest that minor mothers served by both systems have similar characteristics, backgrounds and experiences.

While there are similarities and commonalities across the two systems, there are also issues of note:

- federal, state and local policy suggests that appearance of an "unsafe" home of a parent, legal guardian or adult relative is good cause for not requiring a minor mother to live in these arrangements. It is not clear, however, that a referral to the child welfare system is necessary if it is determined during eligibility determinations that the parental home is unsafe.
- often the decision to refer to the child welfare agency is influenced by the extent to which the foster care system can place minor mothers and their children together. If there are no such placements available welfare staff may be more likely to recommend that teen parents live on their own, potentially with intensive case management.
- as mentioned in an earlier section, when child welfare staff carry out assessment activities for welfare staff these are considered open child protective cases. Some welfare staff felt this was problematic.

Minor Mother/Child Foster Care Placements

When it is possible to keep teen parents and their children together, child welfare agencies have addressed the placement of minor parents in two ways: through placement in specialized foster homes and in group homes. Below is a brief summary of issues related to each model.

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FOSTER HOMES

Specialized foster homes and private residences serving young mothers and their children share similar benefits and challenges. Benefits include:

- a family atmosphere;
- opportunity for modeling of acceptable and appropriate behaviors; and
- the ability to target recruitment to specific geographic areas.

One challenge associated with foster homes for teen parents and their children is recruitment of homes willing to care for a teen parent and a child. Several child welfare providers indicated that first, it is difficult to recruit and retain foster parents for teenagers. Add to this young babies and the challenge is even greater. Foster care agencies and foster parents alike have significantly more responsibilities in dealing with young families.

Another challenge associated with supporting young families in foster homes is the lack of control of the environment and what actually happens in the home. This comes into play particularly as it relates to teaching modeling good parenting skills and behaviors. While foster families are screened and trained to carry out such activities, there are differences in their abilities to serve teen parents and their children. As one provider suggested to us, "foster parents work all day like everyone else. Do we really expect them to come home and "teach" parenting skills after a long day of work?" *For this reason, it is important to link teen parents that are in foster homes with outside supports to build parenting and independent living skills*Exhibit VII.I highlights one programmatic approach to link foster care minor mothers to critical services.

A third challenge facing foster parents working with minor mothers is how to support the teen in her parenting responsibility without parenting the young child. Providers indicated that conflicts can arise and foster parents must learn how to respect the role of minor mothers.

Many of the challenges raised above can be addressed through training and support for this special group of foster care providers. Discussions with sponsors of minor parent/child foster care programs suggest that training should include the following:

- adolescent development;
- factors related to teen pregnancy and parenting, including the incidence of abuse and neglect among this population, educational issues facing this population including Title IX rights and challenges facing the children of teen parents;
- child health and development; and
- facilitating good parenting and independent living skills.

Sponsors of such efforts suggest that training foster parents in groups that allow for peer exchange and sharing is critical.

GROUP HOMES

Group homes are also available to serve teen parents and their babies. Many of the facilities we visited have been in existence for quite some time and serve as models for second chance homes now being developed to support TANF minor mothers in need of adult-supervised living. Given this, the benefits and challenges of foster care group homes are similar to those of congregate facilities for broader populations

EXHIBIT VII.I

Linking Minor Mothers in Foster Care to Services

The Specialized Mother/Baby Foster Care Program operated by the **Lula Belle Stewart Center** in Detroit, MI., provides a variety of therapeutic activities and services designed to enable a minor mother to keep her child as well as improve their overall quality of life. Teens are linked to parenting classes, support groups after care services – these are coordinated through a team of the program Supervisor, Social Worker, Licensing Worker, foster parent and a Social Work Assistant. All services are directed to the teen, her child as well as her family to address the issues and/or situations which made foster care placement necessary.

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as described in Section V. Among other benefits they offer the:

- supervision necessary to support younger teen mothers;
- structure to provide regular instruction in areas such as parenting; and
- an opportunity to keep a close eye on the children.

Similarities in the areas of challenges and/or service barriers also apply. One being the issue of "aging out" of the system with no where to go. However, several providers in a western state mentioned a challenge of these facilities that is different from those mentioned for homes serving other teen parent populations — inadequate reimbursements provided by the child welfare system to care for two residents. In one program we visited the state reimbursement for the child is six times less than that for the minor mother. In addition, requirements of a licensed child placement agency in this state bring staffing requirements that are extremely costly.

Considerations for States and Communities

There are several issues that warrant the attention of state and local welfare and child welfare officials relative to the implementation of the adult- supervised living rule:

- explore whether clarification is necessary as to when a referral should be made to the child welfare system. This primarily centers on what an eligibility worker, or minor parent case manager, should do if there is a good cause exemption based on the "appearance of a unsafe home." Is this an automatic referral or can a welfare official just exempt a teen and approve her assistance?
- in those situations where all assessments to determine good cause are carried out by child welfare, consider the impact this might have on the young parent or her child. Is there a need to classify these cases in a different way?
- periodically review what it costs to adequately shelter and support double foster care placements. Are state foster care reimbursements adequate to provide the intensive, supportive environments that minor parents and their children need?

These are basic issues that warrant the attention of all officials.

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VIII. CONCLUSIONS AND NEXT STEPS

This section of the report summarizes major issues of the minor parent adult-supervised living rule as well as recommendations and next steps for key groups including federal, state and local public officials and their staff, as well as private funders interested in supporting young families.

Major Issues in Implementation and the Provision of Adult-Supervised Living for Minor Mothers and Their Children

First we summarize issues relative to implementation of the rule, followed by issues specific to addressing the housing needs of young families in different ways. Major implementation issues fall into four broad areas including:

- the lack of information on minor mothers and the impact of this rule.

Communities often do not have accurate data on the number of minor mothers on TANF as well as the number of minor mothers who are in need of adult-supervised living. In addition, states/communities are not documenting what happens to teens who apply for assistance and are denied due to this rule.

- the lack of understanding and awareness about the provision and its exemptions.

For example, there is concern that minor mothers are not fully aware that there are exemptions to living with a parent, guardian or relative and that there may be residential programs in the community for which they are eligible. In addition, the non-profit provider system is not fully informed on this rule and associated processes. As a result, they cannot adequately inform young mothers on these issues.

- inconsistency in implementation resulting from a lack of supports for, and the discretion of, individual staff.

TANF staff are taking on new responsibilities. State and local policy provides some guidance, however, staff have some discretion on many aspects of implementation. For example, while the federal law allows for minor mothers to live with a parent, guardian or adult relative, some welfare staff may "emphasize" living with one over the other. Another area where there is discretion is determining when a referral to child welfare is necessary in the instances of what appears to be an "unsafe home."

- system interface issues, i.e., how different parts of the system work together.

In many communities, responsibilities for implementation are shared among multiple partners (several divisions within welfare, between welfare and child welfare, etc.). We found that partners can approach the implementation of the rule in different ways and have different philosophies about what they do. Another example is the lack of follow-up on referrals for minor mothers and their families at critical junctures of the process (i.e., referrals to counseling for reunited families; to case management or community supports for those denied assistance or who cannot apply, etc.)

Another set of challenges were identified relative to providing adult-supervised living for those who cannot live at home with a parent, guardian or adult relative. They include:

- major funding barriers.

This includes a lack of knowledge of funds that exist. In addition, the categorical nature of funding is a barrier — there is a lack of flexible dollars, like TANF and HUD homeless funds, that enable a community to support all young mothers in need. Another issue related to funding is the nature of block grants; while TANF is a flexible funding source that may be used to build second chance homes and other residential

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models, these funds are not targeted to supporting minor mothers. States can choose not to invest funds in this manner.

- regulatory barriers.

These include licensing requirements for program providers who provide residential services particularly to the youngest minor mothers. States set age limits for when a child placement agency license is necessary — it can be costly for programs to meet licensing standards.

- the lack of housing options for teens with different needs and experiences.

Only a few communities that we are aware of have models that provide varied levels of structure and supervision. Again, this is clearly linked to funding and resource issues in addition to the lack of knowledge on behalf of the community as to the varied housing needs of this population. In addition, all of the communities are struggling with the lack of options minor parents have after they reach age 18.

These challenges and issues require new partnerships and investments to support the healthy growth and development of young families. Below are potential next steps and recommendations for key audiences.

Recommendations and Next Steps

The above-mentioned issues raise a number of implications — states and communities are challenged by the new welfare policy and we see a need for providing assistance in a number of areas. While this report identifies a host of concerns regarding the adult-supervised living rule, there are some basic areas of understanding and agreement. For example, there is little argument that *the TANF minor parent provisions aim to facilitate the self-sufficiency of young families and that minor mothers should be in supervised settings. However, obtaining this goal can only occur when there are strategies in place to provide minors with the resources they need to comply with these requirements; this includes access to safe, supportive housing and a range of educational options to comply with the school provisions.*[20] *In addition, the TANF minor mother policies require new supports to the systems responsible for implementing them.*

With these issues in mind, the following activities are critical (in addition to the very specific recommendations identified throughout the text relative to implementation functions and providing various options of adult-supervised living):

- the welfare system should clarify the intent of the rule and how it relates to improving outcomes for minor mothers and their children for all entities working with young families.

While most people do agree that minor mothers should live in supervised settings, there are mixed opinions as to whether this provision is to "punish" young mothers, prevent teen pregnancy, deter young mothers from getting their own assistance, etc. The law states, however, that adult supervision is for the purposes of *building parenting skills, budgeting and others self-sufficiency skills.* How we describe this rule (i.e., the live-at-home requirement) often does not portray the law's true intent and can influence implementation and practice.

- supports to organize and strengthen the minor parent provider community to address the needs of young families.

To ensure that minor parents in need of public assistance and safe supportive housing receive these services, many agencies must work together including welfare, child welfare, schools, health care providers, housing and community-based service providers. This does not just require resources — states actually can use available TANF surplus funds to support such collaboration. In addition, states and communities also need information about how these issues are addressed across the country. Communities would benefit tremendously from technical assistance and facilitation around these issues as well as planning

[20] For more information on how to support schools in their efforts to serve minor mothers relative to the TANF school provisions, see School-Based Programs for Adolescent Parents and Their Young Children. Overcoming Barriers and Challenges to Implementing Comprehensive School-Based Services. CAPD, October 1994.

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VIII. Conclusions and Next Steps (continued)

funds to develop comprehensive visions and action strategies.

- support the development of data and management information systems that provide information necessary to implement effectively.

Communities don't know the extent of need for alternative housing among minor mothers. While minor parents may be able to find housing to meet the requirements of the law, communities still report this is a transient population. As such, communities need tools and strategies to understand the true need and size of this issue. In addition, welfare systems need to build the capacity to document implementation experiences relative to this rule as well as the scope and size of the TANF minor parent population (in nested cases or with their own case).

- support to state and local welfare systems in their new roles.

Welfare staff are taking on a new responsibility – child placement. There are a host of issues associated with this role and some concern among welfare staff as to their ability to carry out these activities. Many would may benefit from periodic discussions and/or training on these issues. Specifically, supports may be provided to staff that are responsible for conducting home assessments. There are many reasons why welfare officials may consider investing in minor parent case managers.

- create funding models that coordinate flexible funds (like TANF and HUD homeless funds) with categorical resources to build a range of safe supportive housing which contributes to the desired outcomes for young families.

Funding is a major barrier – communities are interested in building residential models but are limited by resources. More analysis and exploration is necessary to determine the best ways to use existing funds, in lieu of additional resources for states in this area.

Without these or similar investments, the TANF federal requirements are punitive measures that prohibit young families from reaching their full potential.

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